

## Exhibit 6

R.C.A.  
RECEIVED  
04 MAR 19 PM 4:01

STATE OF ALASKA

THE REGULATORY COMMISSION OF ALASKA

Before Commissioners:

Mark Johnson, Chair  
Kate Giard  
Dave Harbour  
James S. Strandberg  
G. Nanette Thompson

In the Matter of the New Requirements )  
Of 47 CFR § 51 Related to FCC Triennial Review )  
Order Interconnection Provisions and Policies ) R-03-7

RESPONSE OF GCI TO RCA ORDER REQUESTING DATA

GCI Communication Corp. d/b/a General Communication, Inc. and  
d/b/a GCI ("GCI") hereby submits its responses to the data requests issued by  
the Commission on March 1, 2004 as Appendix A to Order No. 3 in the above-  
captioned docket. Pursuant to the Order, GCI is required to respond to  
questions 1, 2, 3, 4, 20, 21, 22, 23, and 24. GCI has repeated those questions  
herein, followed by GCI's response.

QUESTION 1

1) For each area you provide local exchange telecommunications services  
to either on a facilities basis or otherwise, please state:

(a) The number of lines you provide service to in each local incumbent's  
study area.

**Response:** As of January 2004, GCI served 87,327 lines in Anchorage, 10,987  
lines in Fairbanks, and 6,291 lines in Juneau.

STATE OF ALASKA

THE REGULATORY COMMISSION OF ALASKA

Before Commissioners:

Mark Johnson, Chair  
Kate Giard  
Dave Harbour  
James S. Strandberg  
G. Nanette Thompson

In the Matter of the New Requirements )  
Of 47 CFR § 51 Related to FCC Triennial Review )  
Order Interconnection Provisions and Policies ) R-03-7

RESPONSE OF GCI TO RCA ORDER REQUESTING DATA

GCI Communication Corp. d/b/a General Communication, Inc. and  
d/b/a GCI ("GCI") hereby submits its responses to the data requests issued by  
the Commission on March 1, 2004 as Appendix A to Order No. 3 in the above-  
captioned docket. Pursuant to the Order, GCI is required to respond to  
questions 1, 2, 3, 4, 20, 21, 22, 23, and 24. GCI has repeated those questions  
herein, followed by GCI's response.

QUESTION 1

1) For each area you provide local exchange telecommunications services  
to either on a facilities basis or otherwise, please state:

(a) The number of lines you provide service to in each local incumbent's  
study area.

**Response:** As of January 2004, GCI served 87,327 lines in Anchorage, 10,987  
lines in Fairbanks, and 6,291 lines in Juneau.



(b) Our estimated share (percentage) of the total lines served in each local incumbent's study area.

**Response:** GCI estimates its share of local lines served to be 45.9% in Anchorage, 24.6% in Fairbanks, and 23.3% in Juneau, based on the estimated total market lines set forth in the response to Question 1(c).

(c) Your estimate of the total number of lines in each local incumbent's study area.

**Response:** Combining the GCI line counts with the line counts reported by ACS on the CASBB bills dated February 2004, GCI believes there are approximately 190,424 lines in Anchorage, 44,654 lines in Fairbanks, 26,948 lines in Juneau.

## **QUESTION 2**

2) Non-incumbent carriers only: For competitors that serve DS0 end user customers using their own switching facilities, describe where or under what conditions you are unable to provide service to end user customers due to lack of access to end-user DS0 loops or other factors.

**Response:** GCI provided extensive information and data addressing Question 2 in its Comments and accompanying testimony, and as the Commission recognized in Order No. 3, "GCI has already provided information on lack of access to customers through CLEC switches."<sup>1</sup> The Commission also determined that it would "not ask any commenter to restate a position already in the record."<sup>2</sup> For this reason, GCI will not restate the information already submitted in the record of this proceeding in this response to Question 2 here, but incorporates that information by reference and refers the Commission to the GCI Comments at 4-32, the Testimony of Emily Thatcher at 2-24 and Exhibits ET-1, ET-2, ET-3, ET-4<sup>3</sup>, ET-5, ET-6, ET-7, and ET-8.

In addition, attached hereto are three additional maps, designated Exhibit ET-10, ET-11, and ET-12, that depict the geographic areas in each of Fairbanks,

<sup>1</sup> Order No. 3 at 8.

<sup>2</sup> *Id.*

<sup>3</sup> A revised version of ET-4 is attached hereto. The exhibit has been revised to reflect that the device at Thread Needle is a DLC (rather than an OPM, as depicted in the original version), serving lines to which GCI does have access.

Juneau, and Anchorage where GCI has access to loops via its own switching facilities (in green) and where it does not due to ACS' network architecture (in yellow).

### QUESTION 3

3) For a carrier responding to Question 2 that is unable to access certain end-user DS0 loops using its own switching facilities, explain what typical additional costs would be incurred to obtain access to those lines in a service area. If typical costs differ by the nature of the impairment, please indicate so.

**Response:** The only potential solutions to address the impairment caused by ACS' network design (other than continued access to ACS unbundled switching in these circumstances) are: (1) ACS network design changes, as required pursuant to paragraph 297 of the *Triennial Review Order*, or (2) further collocation by GCI at the sub-loop level, which is not required in lieu of access to loops. See GCI Comments at 11-14.

There a number of ACS network adjustments that could be made to accommodate GCI's access to customer loops when ACS installs devices between the customer premises and the central office switch. Should ACS determine the need to install a remote switch or DLC in an area where GCI currently has access to unbundled loops, ACS could leave a sufficient number of copper pairs available to GCI to continue providing service on unbundled loops (effectively bypassing the remote switch or DLC). A sufficient number of copper pairs would be that quantity of pairs necessary to meet the current requirements and reasonable growth. If multiplexing is available at the remote switch or DLC, another technical solution would be the availability to GCI of enhanced extended links ("EELs")—a combination of UNE DS1s, multiplexing, and UNE loops, which GCI could then connect to its own switching facilities. The costs for these solutions should be minimal, given that they would simply require ACS to keep existing network facilities available for use when deploying new devices in its network and that such facilities would continue to be made available to GCI at the applicable UNE rates. In the case of a DLC deployment, ACS could deploy DLCs with multi-hosting capability. With these devices, GCI can access the loops via multi-hosting with a minimum of two T-1 circuits.

As for the second option of further GCI collocation at the sub-loop level—which would be necessary for any non-multi-hostable device ACS deploys—GCI expects that the direct costs to GCI would be significantly higher than any



of the options discussed above. The costs to GCI of further collocation vary from site to site, according to factors including the type of device ACS has installed (e.g., remote/DLC/OPM, multi-hostable/non-multi-hostable), availability of space and power for collocation, and the required capacity. For those OPMs and DLCs that have internal cross-connect panels or external cross-connect cabinets in lieu of main distribution frames, extraordinary modifications may be necessary to terminate tie cables from an adjacently collocated DLC, so that regardless of the tasks and costs, collocation to access such devices would be futile. See GCI Comments at 22. At the very least, the steps necessary to reconstruct the ACS facilities where the facility cross-connect panels or cabinets do not support the termination of tie cables to a collocated DLC would not be incurred when collocating at sites that employ a main distribution frame. See Thatcher Testimony at 12-13 (discussing tasks required to replace the cross-connect panel or cabinet and providing examples of costs under different collocation methodologies). Other examples of when collocation and cross-connect may not be achievable are lack of available space for physical or adjacent collocation, lack of capacity at the main distribution frame, or lack of space for cross-connection in housing for remotes or concentrators. See Thatcher Testimony at 14.

Where these limitations do not exist, however, physical or adjacent collocation can be established through a series of tasks as set forth in the attached Exhibits GCI-1 (Physical Collocation – Typical Task List) and GCI-2 (Adjacent Collocation – Typical Task List). Collocation at the ACS network devices at issue could typically only be accommodated through adjacent collocation, and Exhibit GCI-3 (attached hereto) sets forth sample adjacent collocation costs, based on GCI's estimates for collocation at four locations. The first is the remote at Steese in Fairbanks, to which approximately 2,795 lines are homed. GCI estimates that collocation to access sub-loops at that site would cost approximately \$241,956. The second is the OPM at Dale Road in Fairbanks, to which approximately 646 lines are homed. GCI estimates that collocation to access sub-loops at that site would cost approximately \$155,809. The third is the remote at Mendenhall in Juneau, to which approximately 3,119 lines are homes. GCI estimates that collocation to access sub-loops at that site would cost approximately \$251,194. The fourth is the remote at Lemon Creek in Juneau, to which approximately 2,271 lines are homed. GCI estimates that collocation to access sub-loops at that site would cost approximately \$217,850. It should be noted, however, that the duration and cost of any collocation project may vary by as many tasks that apply, so these representative cost estimates are provided to reflect the type and magnitude of costs that may be incurred. GCI has also addressed the issue of additional costs that would incurred to obtain



1 access to loops served by non-multi-hostable devices in its filed Comments. *See*  
2 GCI Comments at 21-23 and Thatcher Testimony at 11-14.

3 Even further highlighting the unpredictable nature of collocation costs, some of  
4 GCI's costs in establishing a new collocation are within ACS' control. *See*  
5 Thatcher Testimony at 12-13. Examples of costs ACS controls are:

- 6 • Preparing and submitting bids for contract work, reviewing responses,  
7 and awarded contracts.
- 8 • Preparing space in the ACS central office. This includes engineering,  
9 preparation of work orders, ordering of material, logistics, installation of cable  
10 rack, mounting cable blocks on the MDF, placing of VF, DS-1, and DS-3 tie  
11 cables, splicing, terminating, and testing of those cables, placement of power  
12 conductors, and construction of vaults and duct systems (if provided by ACS).  
13 This work is usually done by ACS employees.
- 14 • Preparing collocation space (physical collocation). This includes  
15 architectural design work; obtaining permits; ordering building materials,  
16 HVAC, and fire suppression equipment; demolition and asbestos abatement;  
17 framing; sheetrock work; plumbing; electrical work; painting; and flooring.  
18 And because this work is usually contracted out, even ACS is not within total  
19 control of the costs it ultimately passes onto GCI.

20 In fact, ACS' cost estimates on prior projects typically have been less than the  
21 actual costs, as demonstrated by the following data:

22	Globe (Adjacent)	Estimate:	\$126,695	Actual:	\$158,890
23	Greenwood (Physical)	Estimate:	\$237,593	Actual:	\$272,490
24	Juneau*	Estimate	\$144,933*	Actual:	\$311,272

25 \* This was the total estimated for Juneau Main (physical) and Sterling  
26 (adjacent), which does not include ACS labor costs for Juneau Main. Some of  
27 the cost increases were due to changes in scope of work, but the balance  
resulted from changes to the original estimated costs.

**QUESTION 4**

4) For each month beginning with January 1, 2003, please identify the monthly churn rate your company has experienced in providing local exchange services to end user customers in Alaska. In answering this request, you should calculate the churn rate as the number of voice grade equivalent lines lost each month divided by the average number of voice grade equivalent lines in service each month. In calculating the churn rate, do not include customers that move but remain your customer.

**Response:** See Exhibit GCI-4, attached hereto.

**QUESTION 20**

20) If you are proposing that the RCA develop a batch hot-cut process, please describe what process you would have the RCA establish, and how the process you advocate would resolve any impairment issues or ACS batch cut process efficiencies you believe exist. When responding to this question, please include the following information:

- a) An estimate of the maximum number of lines that should be processed in each batch.
- b) The estimate cost to each party of implementing your proposed solution.
- c) A "stand alone" document that identifies all of the details of your proposal. At a minimum, include in this document the following information:
- d) a list of each task that is part of your proposed batch hot-cut process; the deadlines associated with beginning and completing each task; the terms and conditions that apply under your proposal; whether your proposal replaces, modifies, or assumes the continuing existence of any current ACS batch cut processes.

**Response:** GCI has consolidated its batch host-cut proposal described in its Comments (at 24-31) and in the Testimony of M. Sue Keeling in Exhibit GCI-5 (attached hereto). Exhibit GCI-5 also addresses each of the subparts set forth in Question 20.



**QUESTION 21**

21) For each task identified in part (c)(i) of the previous question, please provide the following information:

- a) the average time you estimate it takes to complete the task; and
- b) the typical occurrence of the task during the process.

**Response:** See Exhibit GCI-5, attached hereto.

**QUESTION 22**

22) Non-incumbent carriers only: Please provide a list of all the ACS-AK, ACS-AN and ACS-F wire centers identified by name, address, and CLLI code, to which you provide or offer transport facilities (*i.e.*, any facilities that, directly or indirectly, provide connections to wire centers) to other carriers. For each facility, please identify:

- a) The type of transport facility (*i.e.*, DS1, DS3, dark fiber);
- b) The transport technology used (*e.g.*, fiber optic (dark or lit), microwave, radio, or coaxial cable);
- c) The level of capacity the facility is capable of supporting.

**Response:** GCI is collocated at seven ACS-designated wire centers in Anchorage, two in Fairbanks, and two in Juneau. At each of these sites, GCI has deployed fiber facilities that are capable of supplying transport to other carriers, such as the high-capacity transport offered by GCI in both its interstate and intrastate tariffs. See also Exhibit GCI-6 (attached hereto) for specific responses to subparts a, b, and c.

**QUESTION 23**

23) Non-incumbent carriers only: Please provide a list of all transport facilities (*i.e.*, trunks) that you connect either directly or indirectly between any two ACS central offices, that you own, control or lease or have obtained use from an entity other than ACS. For each facility, please identify:

- a) The A (beginning) location, the Z (ending) location, and any other premises through which the facility is routed;
- b) The wire center in which the facility is located, by CLLI code (if wire center data is unavailable please report the data by city);

- c) The type of transport facility (*i.e.*, DS1, DS3, dark fiber);
- d) The transport technology used (*e.g.*, fiber optic (dark or lit), microwave, radio, or coaxial cable);
- e) The level of capacity the facility is capable of supporting.

**Response:** See Exhibit GCI-7 (attached hereto) for subparts (a), (b), and (c).

- d) The transport technology used over each route is lit fiber optic.
- e) The type of transport facility provided on the exhibit also is effectively the maximum level of capacity the facility is capable of supporting. Typically, capacity over an OCx facility as these would be utilized as DS1s and DS3s, and in the case of OC12 or above, OC3s.

#### **QUESTION 24**

24) Non-incumbent local carriers only: Please list all the end points to all high capacity loops and dark fiber loops in the ACS-AN, ACS-F and ACS-AK service areas that you own or control and that could be available for the provision of service comparable to UNE DS3 or dark fiber loop services. Indicate whether limitations may exist for availability of these loops as a replacement for the incumbent's unbundled network element DS3 and dark fiber services.

**Response:** See Exhibit GCI-8 (attached hereto). GCI is not currently aware of any limitations with respect to the identified facilities that would affect their use as a replacement for the incumbent's unbundled network element DS3 and/or dark fiber services, as available at each of the customer locations listed in Exhibit GCI-8.

**Dated** March 19, 2004 at Anchorage, Alaska.

Respectfully submitted,

By: Tina Pidgeon by mmw  
Tina Pidgeon  
Vice President, Federal Regulatory Affairs

By: Martin Weinstein  
Martin M. Weinstein  
Regulatory Counsel

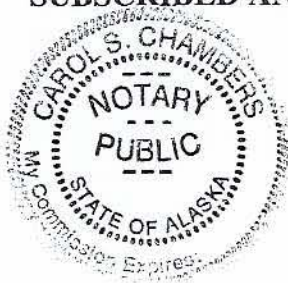


1  
2  
3 **VERIFICATION**

4 I, Martin Weinstein, verify that I believe the statements contained in this  
5 pleading are true and accurate.

6 Martin Weinstein  
7 Martin M. Weinstein

8 **SUBSCRIBED AND SWORN** to before me this 19 day of March 2004.



27 Carol Chambers  
Notary Public in and for Alaska  
My commission expires: 4-2-05